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Attorney for Plaintiff
 LANE BAULDRY

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**IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA**

DMR

LANE BAULDRY,

Plaintiff

v.

TOWN OF DANVILLE, COUNTY OF
 CONTRA COSTA, CITY OF
 PIEDMONT, Government Entities,
 MONA DAGGETT, CHRISTOPHER
 BUTLER, DEPUTY STEPHEN
 TANABE, DEPUTY TOM
 HENDERSON, SERGEANT ANDY
 WELLS and DOES 1 to 50, inclusive,

Defendants

Case No.: **C12-3943**

COMPLAINT FOR DAMAGES FOR
 VIOLATIONS OF CIVIL RIGHTS AND
 OTHER WRONGS

JURY TRIAL DEMANDED

Date Action filed:
 Trial Date:

Plaintiff Lane Bauldry ("Plaintiff") complains of defendants, and each of them, and alleges that:

I. JURISDICTION AND VENUE

1. The Court has jurisdiction to grant the relief requested herein pursuant to the Civil Rights Acts, 42 U.S.C. § 1983, et seq, the Judicial Code, 28 U.S.C. §§ 1331, 1343 and 2201, the constitutions of the United States and State of California, Cal. Gov't. Code § 815.2, and California common law.

2. Venue in the Court is proper because the acts complained of occurred in the Northern District of California, and all parties, live, work or are situated in or around the County of Contra Costa and the County of Alameda, California.

3. On February 14, 2012, Plaintiff timely filed a Petition for Order Relieving Petitioner from Provisions of Gov't Code § 945.4 against the Town of Danville, Danville Police Department, Contra Costa County Sheriff's Office, County of Contra Costa, Government Entities, and Deputy Stephen Tanabe, Deputy Tom Henderson. On March 21, 2012 Plaintiff's Order on Petition for Order Relieving Petitioner from Provisions of Gov't Code 945.4 was entered.

4. On April 14, 2012, Plaintiff timely filed a Petition for Order Relieving Petitioner from Provisions of Gov't Code § 845.4 against the City of Piedmont, and the Piedmont Police Department. On June 15, 2012 the Alameda County Superior Court granted said Petition.

II. PARTIES

5. Plaintiff is, and at all times mentioned herein was, a resident of Oakland, California.

6. Defendant Mona Daggett ("Ms. Daggett") is, and at all times mentioned herein was, (1) a resident of Oakland, California, (2) the wife of Plaintiff, (3) the mother of Plaintiff's child and (4) acted under color of state law.

7. Plaintiff is informed and believes and thereupon alleges that: Defendant Christopher Butler ("Private Investigator Butler") is, and at all times mentioned herein was, (1) a resident of Concord, California, (2) a "Private Patrol Operator" licensed by the State of California Bureau of Security and Investigative Services and (3) acted under color of state law. Private Investigator Butler's license number 14798 was issued on February 26, 2003 and became delinquent on February 28, 2011. Private Investigator Butler operated a business entitled "Christopher B. Butler Investigations" doing business as "Butler & Associates Private Investigations" in Walnut Creek, California. (Private Investigator Butler was a sworn peace officer of the City of Antioch Police Department).

8. Plaintiff is informed and believes and thereupon alleges that: Defendant Deputy Stephen Tanabe ("Deputy Tanabe") is, and at times mentioned herein was, (1) a resident of Alamo, California, (2) a sworn peace officer, (3) an employee of the Contra Costa County Sheriff's Office, and/or (4) an employee of the Danville Police Department, and (5) acted under color of state law. Deputy Tanabe is sued in both his official capacity and in his individual capacity.

9. Plaintiff is informed and believes and thereupon alleges that: Defendant Deputy Tom Henderson ("Deputy Henderson") is, and at all times mentioned herein was, (1) A resident of Contra Costa County, California, (2) a sworn peace officer, (3) an employee of the Contra Costa County Sheriff's Office, and/or (4) an employee of the Danville Police Department, and (5) acted under color of state law. Deputy Henderson is sued in both his official capacity and in his individual capacity.

10. Plaintiff is informed and believes and thereupon alleges that: Defendant Sergeant Andrew Wells ("Sergeant Wells") is, and at all times mentioned herein was, (1) A resident of Alameda County, California, (2) a sworn peace officer, (3) an employee of the Piedmont Police Department, and (5) acted under color of state law. Sergeant Wells is sued in both his official capacity and in his individual capacity.

11. Plaintiff is informed and believes and thereupon alleges that: Defendant County of Contra Costa ("County") is, and at all times mentioned herein was, a public entity duly organized and existing under the laws of the State of California. The County operates the Contra Costa County Office of the Sheriff ("Sheriff's Office")

12. Plaintiff is informed and believes and thereupon alleges that: Defendant Town of Danville, California ("Danville") is, and at all times mentioned herein, was, a public entity duly organized and existing under the laws of the State of California. Danville operated the Danville Police Department.

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1 13. Plaintiff is informed and believes and thereupon alleges that: Defendant City
 2 of Piedmont, California ("Piedmont") is, and at all times mentioned herein, was, a public
 3 entity duly organized and existing under the laws of the State of California. Piedmont
 4 operated the Piedmont Police Department.

5 14. Plaintiff is ignorant of the true names and capacities of the defendants sued in
 6 this litigation as Does One through Fifty, inclusive and, as a result, sues these defendants
 7 by these fictitious names. Plaintiff will amend this Complaint to allege the true names and
 8 capacities of these defendants once they are been ascertained. Plaintiff is informed and
 9 believes and thereupon alleges that each of the fictitiously named defendants (1) is in some
 10 manner responsible for the injuries and damages to Plaintiff alleged in this Complaint and
 11 (2) acted under color of state law.

12 15. Plaintiff is informed and believes and thereupon alleges that at all times
 13 relevant to this litigation, Defendants Ms. Daggett, Private Investigator Butler, Deputy
 14 Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont and Does One
 15 through Fifty, and each of them, were the agents, servants, and employees of their co-
 16 defendants, and that these defendants, in doing the things mentioned in this Complaint,
 17 were acting within the course and scope of their authority as such agents, servants, and
 18 employees, and were acting with the permission and consent of their codefendants.

19 16. The individual defendants carried out the actions complained of in their
 20 individual capacities, under color of state law, and/or in the course and scope of their
 21 employment as employees of the County, Danville and Piedmont. The County, Danville
 22 and Piedmont is obligated, under Cal. Government Code §§ 815.2 and 825(a), to pay any
 23 compensatory damages awarded against some or all of the individual defendants.
 24 Nevertheless, all Defendants are jointly and severally liable for any damage awards.

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III. STATEMENT OF FACTS

A. Ms. Daggett Hires Private Investigator Butler to Attempt a “Dirty DUI” on Plaintiff

17. In the winter of 2010 Ms. Daggett filed a divorce action against Plaintiff.

18. Plaintiff is informed and believes and thereupon alleges that in the fall of 2010, Ms. Daggett met with Private Investigator Butler. Ms. Daggett’s purpose in meeting Mr. Butler was to set up or trap Plaintiff into some illegal activity that she would be able to use against plaintiff in their pending divorce proceedings.

19. Plaintiff is informed and believes and based thereon alleges that, at said meeting Butler advised Daggett he could, using associates he had with various police agencies, arrange to have Plaintiff arrested for driving under the influence by engineering a ruse or set up. Plaintiff would be plied with and encouraged and cajoled to drink alcohol to excess at local taverns. Butler, Tanabe and others would then tip cooperative uniformed officers on duty of the Plaintiff’s driving, after which the uniformed officers would arrest Plaintiff. The Private Investigator Butler referred to this practice as a “Dirty DUI.”

20. At that time, and in exchange for cash, Daggett retained Butler to affect a Dirty DUI on Plaintiff. Plaintiff is informed and believes and based thereon alleges that Ms. Daggett’s purpose in retaining Butler to perform the Dirty DUI was to obtain an advantage in the pending family law custody proceedings that she would not otherwise have been able to obtain, and knew she would not be able to obtain, without this illegal set up. Plaintiff is informed and believes Daggett’s motive was bitterness and vindictiveness, and Daggett’s goal was to reduce or eliminate Plaintiff’s time with his beloved daughter and to punish him.

21. Ms. Daggett agreed to it the plan, and, for compensation, Private Investigator Butler was retained to effectuate the wrongful arrest and jailing of plaintiff.

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B. The First Set-Up in Alameda County

22. On or about October, 2010, and with guidance from Ms. Daggett, Private Investigator Butler, and Deputy Tanabe, and two female employees and agents, went to Crogan's Seafood Restaurant in the Montclair District of Oakland, California to effectuate the false arrest of plaintiff.

23. Plaintiff is informed and believes and based thereon alleges that Defendant Sergeant Wells, like Private Investigator Butler, had worked for the Antioch Police Department and they had become friends and colleagues. Further, Sergeant Wells had coordinated events in Piedmont for Private Investigator Butler unrelated to the Dirty DUI scheme. Plaintiff is informed and believes that Sergeant Wells was the person and officer who was intended by Private Investigator Butler to effect the DUI arrest. Plaintiff is informed and believes and based thereon alleges that Sergeant Wells had been advised of and knew of Private Investigator Butler's illegal and inappropriate schemes, and/or was part of Butler's illegal and inappropriate schemes, and/or should have been aware of Private Investigator Butler's illegal and inappropriate schemes.

24. Plaintiff is informed and believes and based thereon alleges that the plan at Crogan's that evening was to encourage and/or assist Plaintiff to drink alcohol, and then direct or guide him from Crogan's in Oakland into neighboring Piedmont, where Sergeant Wells would be waiting to pull plaintiff over, without cause, and arrest him.

25. Plaintiff is informed and believes and based thereon alleges that Sergeant Wells, having expressly or tacitly agreed to the plan, failed to stop, impede, or report Butler's activities being taken against members of the public and thus failed to stop the Dirty DUI scheme.

26. Plaintiff is informed and believes and based thereon allege that the Dirty DUI plan was aborted by the co-conspirators that evening, and Private Investigator Butler, Deputy Tanabe, and the two female conspirators left Plaintiff at Crogan's who, went home safely and legally.

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27. Because the Piedmont Police Officer and his superiors failed to report and/or act on the information they had on the DIRTY DUI, the DIRTY DUI scheme, and Daggett's participation in it, continued.

C. The Setup for a "Dirty DUI" in Contra Costa County

28. Plaintiff is informed and believes and based thereon alleges that Daggett met with Private Investigator Butler a second time, and again retained him for cash to effectuate a DIRTY DUI against Plaintiff.

29. Plaintiff is informed and believes and thereupon alleges that on or about November 2, 2010 plaintiff was re-contacted by one or more of the agents or employees of Private Investigator Butler and asked to meet at Meenars, at tavern located at 349 Hartz Avenue in Danville, California. Unbeknownst to Plaintiff, this was the second effort by the co-conspirators to have him arrested and jailed.

30. Plaintiff is informed and believes and based thereon alleges that present at Meenar's was Private Investigator Butler, Deputy Tanabe, and the same two female employees and agents who had been at Crogan's.

31. While at Meenars the two female co-conspirators plied, cajoled, encouraged, plaintiff to drink alcoholic beverages both that they had been provided and those provided to Plaintiff.

32. Plaintiff is informed and believes and based thereon alleges that Private Investigator Butler and Deputy Tanabe secretly monitored these activities from inside the bar. Plaintiff is further informed and believes and based thereon alleges that, while this was going on, Private Investigator Butler and/or Deputy Tanabe left the bar to break a tail light on Plaintiff's vehicle, but were unable to do so, and returned to the bar.

33. Plaintiff is informed and believes and based thereon alleges that Deputy Henderson was a colleague and/or friend of Private Investigator Butler and/or Deputy Tanabe and who had prior experiences with both and who had expressly or implicitly agreed to work with them.

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36. Deputy Henderson, as previously planned, pulled Plaintiff over and falsely arrested the Plaintiff without cause for violations of California Vehicle Code Section 23152 (a) and (b).

38. Several days later, the arrest was reported by Ms. Daggett's family law attorney to the Alameda County Superior Court and, as intended, was used to restrict and limit Plaintiff's time with his beloved daughter.

39. As a result of the acts and/or omissions of Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont and Does One through Fifty, and each of them, Plaintiff incurred expenses relating to defending against the Dirty DUI and in defending himself in the custody dispute, including attorneys' fees and costs, in amounts to be determined according to proof.

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40. As a result of the acts and/or omissions of Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont and Does One through Fifty, and each of them, Plaintiff suffered injury to his reputation in the community.

41. As a result of the acts and/or omissions of Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County Danville, Piedmont and Does One through Fifty, and each of them, Plaintiff suffered lost employment opportunities.

42. As a result of the acts and/or omissions of Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont and Does One through Fifty, and each of them, Plaintiff suffered emotional distress including suffering, anguish, fright, horror, nervousness, grief, anxiety, worry, shock, humiliation and shame, in amounts to be determined according to proof.

43. As set forth above, the acts, and/or omissions of Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont and Does One through Fifty, and each of them, were willful, wanton, reckless, malicious, oppressive and/or done with a conscious or reckless disregard for the constitutional rights and state law rights of Plaintiff. Plaintiff therefore will seek an award of punitive and exemplary damages, against Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont and Does One through Fifty, and each of them in amounts to be determined according to proof.

44. Plaintiff retained private counsel to represent him in this matter and is entitled to an award of attorneys' fees, pursuant to 42 U.S.C. Section 1988.

V. PLAINTIFF'S CLAIMS

45. All claims for relief set forth below incorporate all of the facts set forth above.

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FIRST CLAIM FOR RELIEF

Bad Faith Arrest

42 U.S.C § 1983 – Violation of the Fourth Amendment to the U.S. Constitution

(Deputy Tanabe and Deputy Henderson)

46. The above-described Dirty DUI arrest of Plaintiff by Deputy Tanabe and Deputy Henderson was the result of entrapment, without purpose or justification in law, lacked probable cause, was objectively unreasonable, was unnecessary, was not privileged in any way or protected by qualified immunity, and was in violation of the Fourth Amendment.

47. Plaintiff is entitled to judgment against Deputy Tanabe and Deputy Henderson who arrested Plaintiff or aided in the Dirty DUI arrest of Plaintiff.

SECOND CLAIM FOR RELIEF

Conspiracy to Commit Bad Faith Arrest

42 U.S.C. § 1983 – Violation of the Fourth Amendment to the U.S. Constitution

(Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe,

Deputy Henderson, Sergeant Wells and Does One to Twenty – Five)

48. The above-described Dirty DUI arrest of Plaintiff by Deputy Tanabe and Deputy Henderson was the result of a conspiracy to deprive Plaintiff of his constitutional rights by means of a scheme to entrap him to be arrested for driving under the influence of an alcoholic beverage. Defendants Ms. Daggett, Deputy Tanabe, Deputy Henderson, Sergeant Wells and Does One through Twenty-five, and each of them, agreed with each other to accomplish the Dirty DUI arrest of Plaintiff in violation of his Fourth Amendment rights.

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THIRD CLAIM FOR RELIEF

Egregious Official Conduct Intended to Injure Unjustified by Any Government Interest

42 U.S.C. § 1983 – Violation of the Fourteenth Amendment to the U.S. Constitution

(Deputy Tanabe and Deputy Henderson)

49. The above-described Dirty DUI arrest of Plaintiff by Deputy Tanabe and Deputy Henderson was the result of entrapment, without purpose or justification in law, was subjectively unreasonable, was unnecessary, was not privileged in any way or protected by qualified immunity, and was in violation of the Fourteenth Amendment. “Entrapment is indistinguishable from other law enforcement practices which the courts have held to violate due process. Entrapment is an affront to the basic concepts of justice. Where it exists, law enforcement techniques become contrary to the established law of the land as an impairment to due process.” *Baker v. McCollan*, 442, U.S. 137 142-143 (1979). The actions and behavior of Deputy Tanabe and Deputy Henderson in entrapping Plaintiff via a Dirty DUI arrest constituted abuses of power, which “shock the conscience”, in violation of the Fourteenth Amendment.

FOURTH CLAIM FOR RELIEF

Conspiracy to Commit Egregious Official Conduct intended to

Injure Was Unjustified by Any Government Interest

42 U.S.C. § 1983 – Violation of the Fourteenth Amendment to the U.S. Constitution

(Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe,

Deputy Henderson, Sergeant Wells and Does One to Twenty-Five)

50. The above-described Dirty DUI arrest of Plaintiff by Deputy Tanabe and Deputy Henderson was the result of a conspiracy to deprive Plaintiff of his constitutional rights by means of a scheme to entrap him to be arrested for driving under the influence of an alcoholic beverage. Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe and Deputy Henderson, Sergeant Wells and Does One through Twenty-five, and each of them, agreed with each other to accomplish the Dirty DUI arrest of Plaintiff in violation of his Fourteenth Amendment rights.

FIFTH CLAIM FOR RELIEF

False Arrest and Imprisonment

(Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont and Does One to Twenty-five)

51. The above-described Dirty DUI arrest of Plaintiff By Deputy Tanabe and Deputy Henderson was the result of a conspiracy to deprive Plaintiff of his constitutional rights by means of a scheme to entrap him to be arrested for driving under the influence of an alcoholic beverage. Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont and Does One through Twenty-five, and each of them, agreed with each other to accomplish the Dirty DUI arrest of Plaintiff in order to have Plaintiff falsely arrested and imprisoned.

52. Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont and Does One through Twenty-five, and each of them, either arrested Plaintiff or caused Plaintiff to be arrested without a warrant.

53. The conduct of Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont and Does One through Twenty-five, and each of them, was a substantial factor in causing Plaintiff's harm.

SIXTH CLAIM FOR RELIEF

Abuse of Process

(Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont and Does One to Twenty-Five)

54. The above-described Dirty DUI arrest of Plaintiff by Deputies Tanabe and Henderson was the result of a conspiracy to deprive Plaintiff of his constitutional rights by means of a scheme to entrap him to be arrested and prosecuted for driving under the influence of an alcoholic beverage. Defendant Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont and Does

One through Twenty-five, and each of them, agreed with each other to accomplish the Dirty DUI arrest of Plaintiff in order to have Plaintiff falsely arrested and prosecuted.

55. Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont and Does One through Twenty-five, and each of them, intentionally used the false arrest and prosecution of Plaintiff for driving under the influence of an alcoholic beverage in order for Ms. Daggett to attempt to obtain leverage over Plaintiff in the divorce proceedings and/or parental custody matters.

56. Plaintiff was harmed by the actions of Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont, and Does One through Twenty-five, and each of them.

57. The conduct of Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont, and Does One through Twenty-five, and each of them, was a substantial factor in causing Plaintiff's harm.

SEVENTH CLAIM FOR RELIEF

Intentional Infliction of Emotional Distress

**(Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe,
Deputy Henderson, Sergeant Wells, County, Danville, Piedmont
and Does One to Twenty-Five)**

58. The above-described Dirty DUI arrest of Plaintiff by Deputy Tanabe and Deputy Henderson was the result of a conspiracy to deprive Plaintiff of his constitutional rights by means of a scheme to entrap him to be arrested and prosecuted for driving under the influence of an alcoholic beverage. Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont, and Does One through Twenty-five, and each of them, agreed with each other to accomplish the Dirty DUI arrest of Plaintiff in order to inflict emotional distress upon Plaintiff.

59. The conduct of Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont, and Does One through Twenty-five, and each of them, was outrageous.

60. Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont, and Does One through Twenty-five, and each of them, intended to cause Plaintiff Emotional distress or, in the alternative, Defendants Ms. Daggett, Private Investigator, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont, and Does One through Twenty-five, and each of them, acted with reckless disregard of the probability that Plaintiff would suffer emotional distress, knowing that Plaintiff was present when he was subjected to the Dirty DUI arrest.

61. Plaintiff suffered severe emotional distress.

62. The conduct of Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County Danville, Piedmont, and Does One through Twenty-five, and each of the, was a substantial factor in causing Plaintiff's severe emotional distress.

EIGHTH CLAIM FOR RELIEF

Negligence

**(Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe,
Deputy Henderson, Sergeant Wells, County, Danville, Piedmont
and Does One to Twenty-Five)**

63. Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont, and Does One through Twenty-five, and each of them, owed Plaintiff a duty to use reasonable care in order to prevent harm to plaintiff.

64. Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont, and Does One through Twenty-five, and each of them, was negligent in that they failed to use reasonable care in order to prevent harm to Plaintiff.

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65. Plaintiff suffered harm as a result of the negligent conduct of Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont, and Does One through Twenty-five, and each of them, including serious emotional distress.

66. The negligent conduct of Defendants Ms. Daggett, Private Investigator Butler, Deputy Tanabe, Deputy Henderson, Sergeant Wells, County, Danville, Piedmont, and Does One through Twenty-five, and each of them, was a substantial factor in causing Plaintiff's harm.

PRAYER

1. For compensatory damages and other special damages according to proof;
2. For general damages according to proof;
3. For punitive damages against all individual defendants according to proof;
4. The prejudgment interest at the legal rate according to proof;
5. For costs and attorney's fees; and,
6. For such other relief as the Court may deem proper.

Dated: July 26, 2012

THE HALEY LAW OFFICES, P.C.

By: _____
Matthew D. Haley, Esq.
Attorney for Plaintiff Lane Bauldry

JURY TRIAL DEMANDED

Plaintiff Lane Bauldry demands a trial by jury in this action.

Dated: July 26, 2012

THE HALEY LAW OFFICES, P.C.

By: _____
Matthew D. Haley, Esq.
Attorney for Plaintiff Lane Bauldry